



Tarter Krinsky & Drogin LLP
1350 Broadway
New York, NY 10018
T. 212.216.8000
F. 212.216.8001
www.tarterkrinsky.com

Laurent S. Drogin, Partner
Direct Dial: (212) 216-8016
ldrogin@tarterkrinsky.com

October 26, 2022

Via ECF

Honorable Lewis J. Liman, U.S.D.J.
Daniel Patrick Moynihan Courthouse
500 Pearl St.
New York, New York 10007

**Re: *Graham Chase Robinson v. Canal Productions, Inc. et al.*
Civil Action No. 1:19-cv-9156 (LTS) (KHP) (the “Action”)**

Dear Judge Liman:

This firm represents defendant Canal Productions Inc. (“Canal”) along with Traub Lieberman Straus & Shrewsberry LLP as co-counsel for Canal and counsel for defendant Robert De Niro (collectively, the “Defendants”).

We write pursuant to your Individual Practices in Civil Cases, Rules 1(C) and 1(D), to request a two (2) calendar day extension of time to file Defendants’ summary judgment motion (and its supporting papers) from Friday, October 28 to Sunday, October 30. The October 28 date was set by Magistrate Judge Parker’s Order (ECF #217), and this is the first and only request for adjustment of these dates. No other modifications to the briefing schedule are sought. Presently, no appearances are scheduled in this Action.

We sought consent from opposing counsel who indicated in writing: “We don’t consent to the proposed extension. There’s no carveout to Judge Liman’s default schedule based on the consent of the parties; as we understand it, exceptional circumstances must be shown.” No harm or prejudice was identified.

Due to workflow, other unanticipated client matters that have arisen, and coupled with the compilation of substantial documentation to be integrated in support of Defendants’ motion, the additional two (2) days are necessary and requested to enable Defendants to finalize their submissions.

We see no prejudice to opposing counsel, their client, or the Court, as no other dates are impacted; or why exceptional circumstances would be required. That is not how we read the Court’s rules, and we view this more as a matter of professional courtesy and cooperation required by Federal Rule 1. We thank the Court for its consideration of this request.

Respectfully submitted,

TARTER KRINSKY & DROGIN LLP

/s/ Laurent S. Drogin and

/s/ Brittany K. Lazzaro